

Permitting, Environment and Regulatory Affairs

Environmental Services 701 NW 1st Court, 2nd Floor Miami, Florida 33136-3912 T 305-372-6925 F 305-372-6954

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December 29, 2014

Stuart Perry Indoor Environments and Grants Section USEPA Region IV Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303-8960

Subject:

Region 4 Air Planning Agreement Reporting - Miami-Dade County Performance under the

Fiscal Year 2013-2014 EPA Section 105 Grant.

Dear Mr. Perry:

The purpose of this letter is to inform you that Miami-Dade County (MDC) continued its work to address the EPA Strategic Plan Goals of Improving Air Quality, Enforcing Environmental Laws, and taking action on Climate Change. Specifically, MDC has met all grant commitments and outputs/outcomes established in the 105 Grant Workplan for fiscal year 2013-2014. The listing below reflects some of the activities performed by the Air Quality Management Division staff during the subject fiscal year:

- Inspected 276 (55%) of all National Emissions Standards for Hazardous Air Pollutants (NESHAP) asbestos demolition/renovation projects. At least one (1) NESHAP project per contractor was inspected during the performance year.
- Thirteen (13) asbestos abatement entries were made by our asbestos inspectors, to observe work practices throughout FFY 2014.
- Approximately 98% of all asbestos renovation/demolition jobs that were inspected in FFY 2014 were found to be in compliance with the federal NESHAPS.
- Provided asbestos NESHAP information to FDEP to facilitate quarterly submission to the Environmental Protection Agency.
- Provided bi-annual medical monitoring and annual asbestos refresher certifications in, inspections, project management and supervision, training and personal protective equipment for three (3) asbestos project inspectors, including an respiratory annual quantitative respiratory fit testing.
- Continued the use of the FDEP Electronic Access System for Inspection Information Retrieval (EASIIR), FDEP Air Resources Module Systems (ARMS) & the General Permit Compliance & Inspection (GPCI) databases.
- Provided accurate and timely data for synthetic minor sources to FDEP for updating of the AIRS Facility Subsystem database.
- Operated and maintained sixteen (16) air quality monitors/samplers at nine (9) locations within Miami-Dade County.
- Ambient air samples were collected for ozone, nitrogen dioxide, carbon monoxide, sulfur dioxide, PM 2.5 and PM 10.
- In conjunction with the Air Quality Index (AQI), Miami-Dade County submitted an Air Quality Forecast to the EPA AIRNow website daily by 3:30p.m., during the ozone season and throughout rest of the year. The current AQI and the forecasted AQI were made available to the local community and the public via the DERM's website at,

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http://www.miamidade.gov/environment/air-quality-index.asp and is also available via the website http://www.airnow.gov

 The samples were analyzed, data recorded and the frequency of collection performed, were based on the following parameters:

Parameter	Number of Sites	Frequency of Collection (runs) Every sixth (6th) day	
Particulate Matter (PM10)	2		
PM2.5 sequential	2	Daily	
PM2.5 sequential	. 1	Every third (3rd) day	
PM2.5 sequential collocated	1	Every sixth (6th) day	
PM2.5 continuous (TEOM)	2	Daily	
Carbon Monoxide	3	Hourly	
Ozone	2	Hourly	
Nitrogen Dioxide	2	Hourly	
Sulfur Dioxide	1	Hourly	

- Performed requisite data review and quality assistance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This includes the reporting and data certification requirements.
- A 93.1% air monitoring equipment collection efficiency was achieved for the period October 1, 2013 through September 30, 2014.
- The six (6) levels of health concern as reported in the AQI for FFY 2014 for Miami-Dade County are as follows:

Air Quality Index (AQI) Values	Level of Health Concern	Percentage of Days in FFY 2014 91.2%	
0-50	Good		
51 -100	Moderate	8.5%	
101-150	Unhealthy for sensitive groups	0.3%	
151-200	Unhealthy	0%	
201-300	Very Unhealthy	0%	
301-500	Hazardous	0%	

• Received \$234,600 in grant award for the creation/establishment of a Near Road Monitoring site within MDC to monitor for NO₂. However, the site location has not been finalized as yet.

• Summary of compliance assistance activities for non-major sources

- o Approximately 1,024 county and 24 state renewal letters were sent to air permitted facilities as reminders of upcoming permit renewal dates.
- At least one (1) inspection was conducted throughout FFY 2014 at non-major sources of air pollution facilities.
- Approximately 95% of all non-major sources of air pollution permitted facilities were found to be in compliance with local, state and federal guidelines and regulations.
- o Eighteen (18) enforcement notices were issued to non-major sources of air pollution during FFY 2014 for violation(s) of Chapter 24, the environmental code of MDC.
- o Calendars were printed & provided to owner/operators.
- O Construction permits are usually issued for a maximum of twelve (12) months. Status inspections are performed biannually to determine the progress of the project and to

- provide any input and information the facility may need prior to submitting an application for an annual operating permit.
- o Facilities are referred to the Small Business Assistance Program as appropriate for assistance.
- o During the annual compliance inspections, staff reminds the facility representatives of any upcoming source testing and reporting requirements.
- o A breakdown of the different types of air permitted facilities within MDC are as follows:

State Permitted Facilities (Non-Title V)		County Permitted Facilities	
General Permit	296	A Sources (≥ 100 TPY)	11
Synthetic Non-Title V	31	B Sources (≥ 25 <100 TPY)	86
True Minor Non-Title V	51	C Sources (<25 TPY)	1063
Total	378	Total	1160

- o In addition to the above, there are twenty five (25) Title V facilities operating within MDC. Eight (8) of these Title V facilities are owned and operated by MDC government. Pursuant to Standard Operating Agreements between MDC and the FDEP, the permitting and compliance authority for these eight (8) county owned facilities remains with FDEP, in order to avoid any conflict of interest.
- o Within the period of review for FFY 2014, five (5) Notices of Violations were issued to Title V facilities. Currently compliance/remediation is pending for one (1) facility.

Additional Activities

- Participation in on-going meetings related to transportation conformity, transportation projects and Developmental Regional Impact (DRI) projects.
- o Integral involvement in the monthly Transportation Planning Technical Advisory Committee (TPTAC), Long-Range Transportation Plan (LRTP), Transportation Improvement Plan (TIP), Unified Planning Work Program Development Committee (UPWP), and the Municipal Grant Program Committee meetings.
- Staff reviewed and commented on the potential air quality impacts of transportation and other proposed projects in Miami-Dade County.
- o Continued to proactively promote the implementation of climate change initiatives as it relates to the Miami-Dade County's GreenPrint sustainability plan.
- o MDC continued to be a part of the Southeast Diesel Collaborative Committee and the Gold Coast Clean Cities Coalition.

If you have any questions regarding this report, please call me at (305) 372-6925.

Sincerely

H. Patrick Wong, Chief

Air Quality Management Division

cc: Beverly Banister, EPA Region 4 Jeff Koerner, P.E., Florida DEP

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